UNITED STATES DISTRICT COURT
for the
DISTRICT OF MASSACHUSETTS

ANTHONY DACRE, Plaintiff

V.

Civil Action

WHITE WATER SEAFOOD CORP., Defendant

No. 03-12269-RCL

PLAINTIFF'S RULE 26(A)(1) DISCLOSURE

1. <u>Witnesses</u>

Anthony Dacre 411 North 26th St. Richmond, VA 23223

David Bloomquist address unknown

Jimmy Flagal address unknown

Richard J. Kornahrens 149 Indies Dr. North Duck Key, FL 33050

Mrs. Richard J. Kornahrens 149 Indies Dr. North Duck Key, FL 33050

Barry Marks address unknown

Bradley Roxby address unknown

Bruce E. Mathern, M.D. MidAtlantic Spine Specialists 7650 Parham Rd. Richmond, VA 23294 William O. McKinley, M.D. MCV Hospitals P.O. Box 980679 Richmond, VA 23298

MCV Hospitals various physicians P.O. Box 980679 Richmond, VA 23298

2. <u>Document Information</u>:

- 1. See documents disclosed in Plaintiff's Local Rule 35.1 Discovery Response.
- 2. See documents categorized in section 3, <u>infra</u>.
- 3. Discovery is continuing, and the Plaintiff reserves the right to supplement this disclosure.

3. <u>Damages Information</u>:

The Plaintiff's damages capable of computation are all unpaid medical bills, lost wages and lost earning capacity. The following documents have relevance to this claim:

- 1. See documents disclosed in Plaintiff's Local Rule 35.1 Discovery Response.
- 2. Plaintiff's tax returns and earnings records.
- 3. Plaintiff's Social Security decision dated July 24, 2003.
- 3. Discovery is continuing, and the Plaintiff reserves the right to supplement this
 - 4. The Plaintiff also claims other damages not capable of computation as set forth in the Complaint.

Respectfully submitted for the the Plaintiff, Anthony Dacre, by his attorney,

David J. Berg, Esq. Latti & Anderson LLP 30-31 Union Wharf Boston, MA 02109 617-523-1000

CERTIFICATE OF SERVICE

I hereby certify that a copy of this pleading was sent this date via first class mail to all counsel of record.

David J. Berg, Esq. Latti & Anderson LLP 30-31 Union Wharf Boston, MA 02109 617-523-1000

Dated: 2/7/07